



February 26, 2019

**Filed via ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*RE: Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89*

Dear Ms. Dortch:

On Friday, February 22, 2019, Derrick Owens, Gerry Duffy, and the undersigned representing WTA – Advocates for Rural Broadband “WTA” met with Nirali Patel, Wireline Advisor to Chairman Ajit Pai to discuss developments in the above referenced proceeding.

WTA gave an overview of the comments it filed on November 16, 2018 in response to the Wireline Competition Bureau’s Public Notice of October 26, 2018.<sup>1</sup> Of note, WTA recommended that the Commission use its expertise to study the matter further so that the Commission and industry could have a complete grasp of the costs of a transition away from equipment prohibited by the 2019 National Defense Authorization Act. Such a study should also consider what types of equipment actually impact national security and should be banned versus what types of equipment are deemed to not be a threat.

These findings would be beneficial as Congress and the Commission consider if funding should be provided to replace the existing equipment. Since this is a matter of national security, WTA believes that any funding should be in the form of a Congressional appropriation rather than drawing money from the limited Universal Service Fund.

Pursuant to Section 1.1206(b) of the Commission’s Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,

/s/ Bill Durdach

Bill Durdach  
Director, Government Affairs

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<sup>1</sup> Comments of WTA – Advocates for Rural Broadband, WC Docket No. 18-89, filed on November 16, 2018; *Public Notice*, WC Docket No. 18-89, released October 26, 2018.

cc: Nirali Patel